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July 26, 2013

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: ***Ex Parte Presentation***
CG Docket Nos. 03-123, 10-51 and 13-24

On July 24, 2013, representatives of Sprint Corporation (“Sprint”) met with Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau (“CGB”), Greg Hlibok, Chief, Disability Rights Office (“DRO”), David Schmidt, Office of Managing Directory (“OMD”), Bob Aldrich, CGB, Eliot Greenwald, DRO, and Diane Mason, OMD. In attendance for Sprint were Mike Ellis, National Director, Sprint Relay, and Scott Freiermuth, Counsel, Federal Government Affairs.

During the meeting, Sprint discussed its outstanding Petition for Limited Temporary Waiver in which it seeks relief from the Federal Communications Commission’s (“Commission”) speed-of-answer requirements governing the provision of IP Relay. This waiver is necessary to ensure that Sprint can continue providing IP Relay to consumers even as it assimilates the customers previously served by Sorenson Communications, Inc.

Sprint also discussed its concerns with the CGB’s July 1st TRS rate order. Sprint explained that the continued upheaval in the IP Relay industry, with the exit of three competitors in recent months including Sorenson, necessitates a fresh look at the rate calculation. Sprint emphasized the importance of taking quality of service into consideration when calculating the rate. To that end, Sprint shared with the Commission a handout summarizing the Paisley Group Ltd.’s *National Relay Service Performance Index* published March 2013.¹

Finally, in a follow-up conversation with Eliot Greenwald on July 25th, the Commission asked Sprint to clarify information related to its provision of WebCapTel and Wireless CapTel. Specifically, Sprint informed the Commission that a user of these services must enter a User ID and Password in order to place a call.

Pursuant to Section 1.1206 of the Commission’s rules, this letter is being electronically filed with your office. Please let us know if you have any questions regarding this filing.

¹ Attached is the meeting handout summarizing pertinent information from the *National Relay Service Performance Index* along with supporting pages from the *Index*. A complete copy of the *Index* may be obtained by contacting Jeff Rudolph at jrudolph@thepaisleygroup.com.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Scott R. Freiermuth", is written over a horizontal line.

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cc: Karen Peltz-Strauss, (via e-mail)
David Schmidt, (via e-mail)
Greg Hlibok (via e-mail)
Bob Aldrich, (via e-mail)
Diane Mason (via e-mail)
Eliot Greenwald (via e-mail)

Attachments

IP RELAY

QUALITY OF SERVICE

- *National Relay Service Performance Index* published March 2013
- Paisley Group Ltd. Study conducted 1/19/2013 – 2/28/2013
- At that time, there were five (5) IP Relay Providers
 - ATT and Hamilton are no longer providing IP Relay
 - Sorenson to stop providing IP Relay on July 31
 - Leaving Sprint and Purple (i711.com)

	Sprint	Purple/ i711.com
Average Connect Time	10.7 seconds	23.5 seconds
Average Words Per Minute (WPM)	76.4	48.4
% at 60 + WPM	84.0%	15.3%
% Accuracy – Typed Accuracy	95.3%	93.5%
Total Calls w/ over 95% Accuracy	72.0%	60.7%
Over 95% Accurate & 60+ WPM	64.7%	9.3%
Critical Errors	9	24
Overall Customer Care	100%	94%

National Relay Competitive Index



National Relay Service Performance Index

Prepared by: The Paisley Group Ltd.

March 2013

National Relay Competitive Index

Purpose

The Paisley Group, Ltd. (PGL) is proud to release this edition of the Relay Performance IndexSM (Index). This is the industries only comparative study that provides Relay Service-related companies with specific competitive intelligence to track and gauge their performance against other competitive providers. Such intelligence is invaluable for continuous improvement, for making strategic business decisions and, in this very competitive environment, for promoting the subscriber's Relay services.

PGL audited all companies using the same processes, samples and strict statistical standards to provide the most accurate comparison possible. Calls were placed to each company in a timely fashion to ensure identical circumstances. Data provided includes the typing speed and accuracy of the Communication Agent (CA) from IP providers Sprint IP, Hamilton IP, AT&T IP, Sorenson IP and i711.com, as well as TTY providers AT&T, Hamilton, and Sprint, .

Methodology

The Paisley Group (PGL) auditors contacted each relay providers national access route using a Teletype (TTY) device or an internet relay (IP) service. All calls were made with written scripts. The CA was timed using an electronic stopwatch while the CA is typing during the call. Calls made with a TTY device were timed by activating the timer as typed letters appeared. When typing paused, the timer was deactivated and re-started when the typing began. For IP calls, typed letters come across the screen in chunks. The timer is activated when the first letter appeared and the timer was stopped when the last letter appeared. Sorenson IP and AT&T use a Instant Messaging based application, WPM were not calculated. PGL used new scripts for this audit so that no provider would have previous knowledge of the scripts. Each script was designed to give the CA ample typing time and a variety of words and phrases to test the speed and accuracy fairly.

Words Per Minute (WPM) were calculated by counting the number of characters divided by the time (in seconds), multiplied by 60 (to get characters per minute), divided by 5 (5 characters per word).

The accuracy of the typing was calculated by taking the number of errors made divided by the number of words typed. Spoken errors were tracked and accuracy was determined by dividing the number of errors by the number of spoken words.

150 calls were made into each provider. The calls were placed over all seven days of the week and were completed between the hours of 6am and 11pm during the time period of January 19th to February 28th, 2013.

Sprint, Hamilton, and AT&T audit events were placed using NexTalk software with a voice modem at TTY speed. IP calls were made to the websites of Hamilton Online, i711.com, Sorenson AIM, AT&T AIM and Sprint Online.

National Relay Competitive Index

Customer Care

Customer CareSM was included in this measurement. Care evaluates: 1) the extent to which CAs leave customers with the impression that they were engaged on their behalf (customer advocacy), and; 2) the extent to which CAs follow prescribed procedures (call handling efficiency.)

Unlike many subjective measurements of customer service, the **Customer CareSM** process measures on an array of specific CA behaviors that detract from the customer's experience. A few examples include:

- CA asks for the same information multiple times
- CA fails to recover from technical issues in an appropriate manner
- CA does not open or close the call appropriately, including providing their CA number
- CA speaks in a monotone or rude tone, or types in an unclear manner
- CA does not appropriately acknowledge

If any unacceptable Care behavior is demonstrated at any time throughout the call, the call is considered "not cared for". A single call can have more than one unacceptable **Customer CareSM** indicator, meaning the total number of indicators may be greater than the number of calls not cared for.

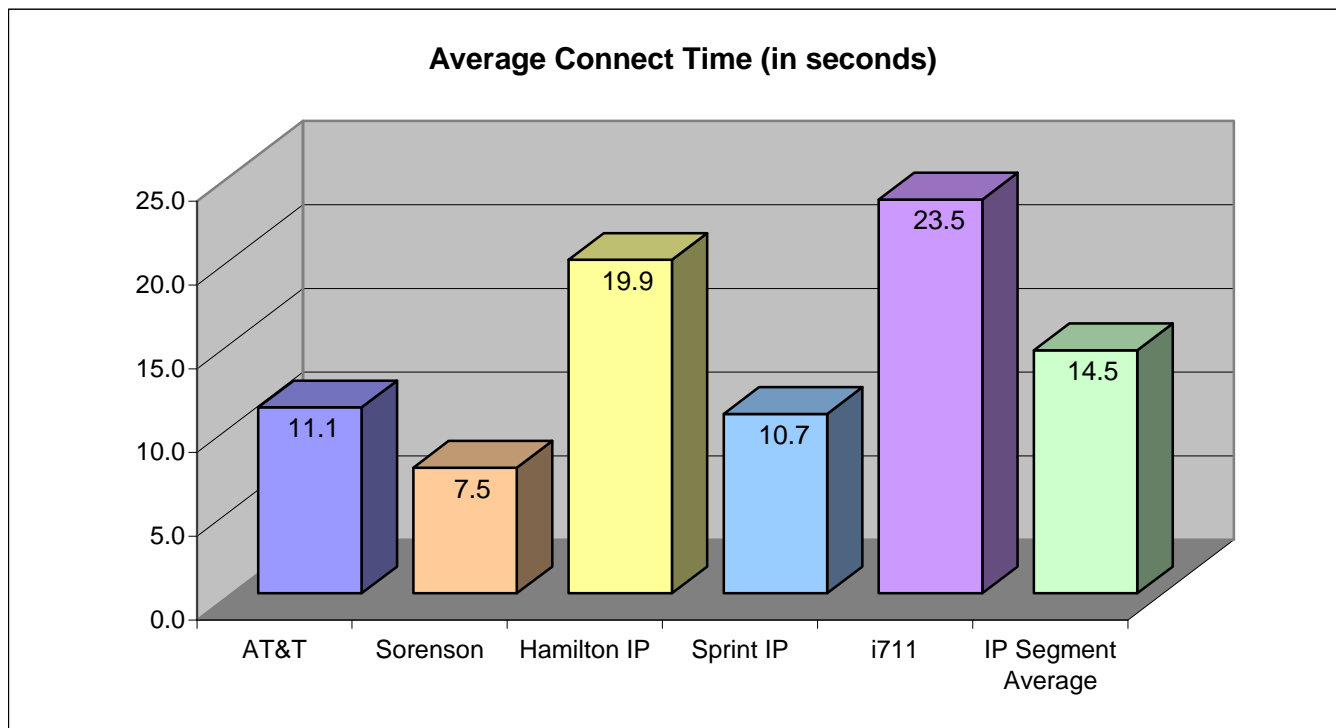
Passed Calls

Passed Calls are the hallmark of a "perfectly" handled call. They epitomize Outstanding Call Quality and typically correlate with the level of "Delighted" Customers.

Passed Calls include all of the following attributes:

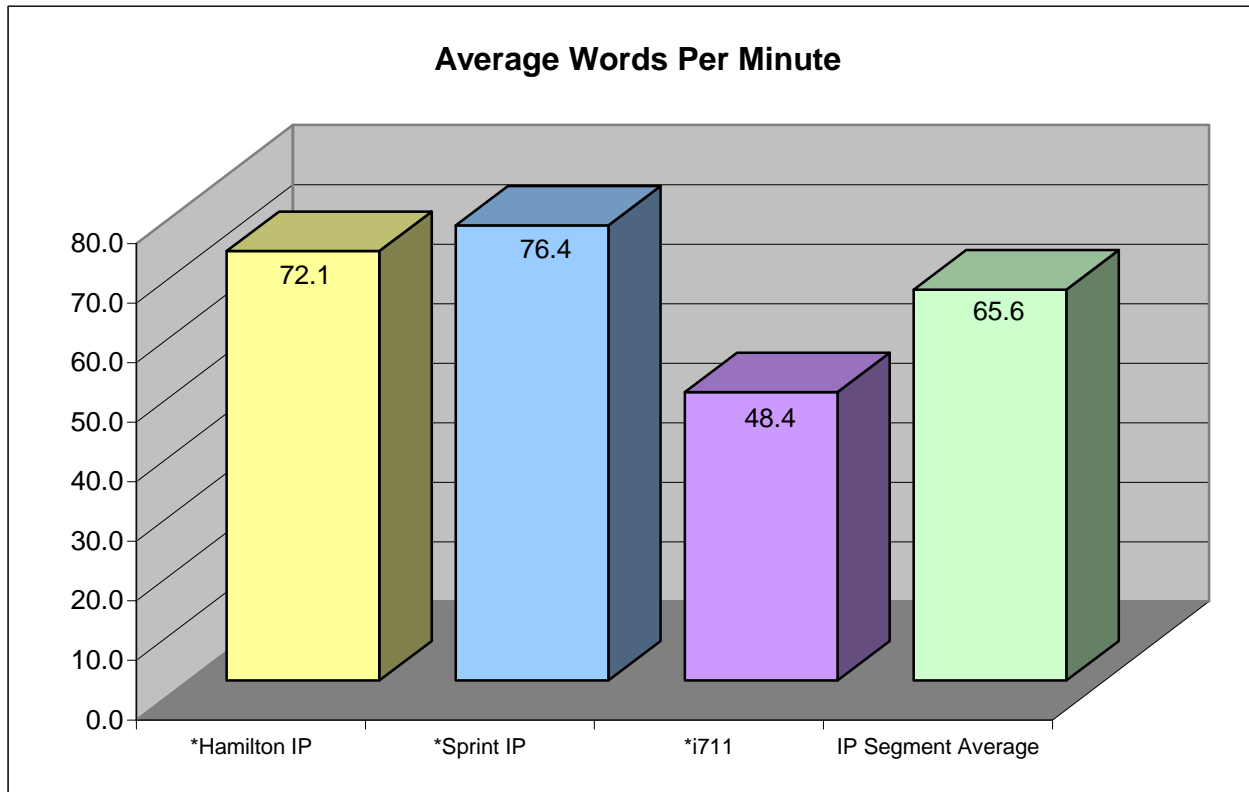
- **Greater than 95% Typing Accuracy**
- **60 Words Per Minute or higher (omitted for IP)**
- **No Critical Errors**
- **100% Verbatim Accuracy**
- **No Customer Care Errors**

National Relay Competitive Index



CALL TIMING			
Company	Average Connect Time	Conversation Minute Length	Session Minute Length
	Seconds	(min : sec)	(min : sec)
AT&T	11.1	3:40	3:53
Sorenson	7.5	3:51	4:07
Hamilton IP	19.9	3:34	4:00
Sprint IP	10.7	3:34	3:53
i711	23.5	4:34	4:56
IP Segment Average	14.5	3:50	4:10

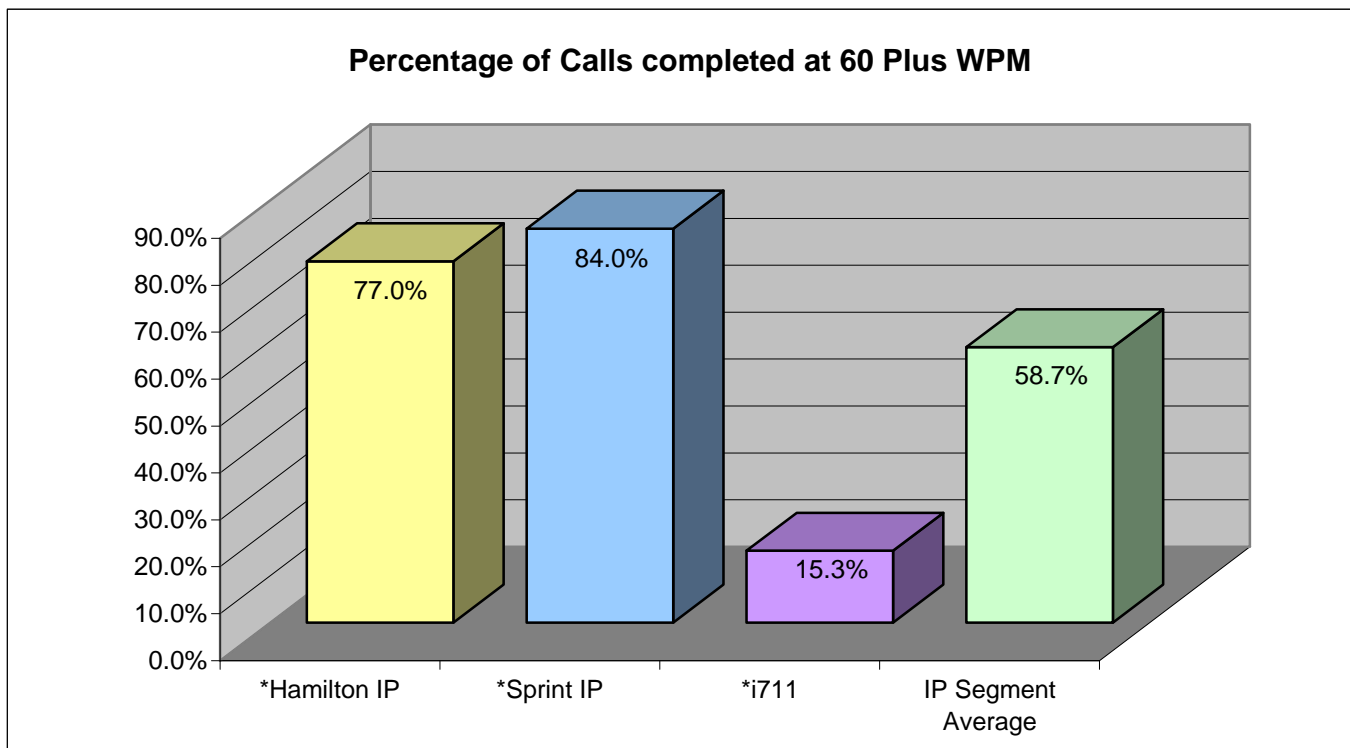
National Relay Competitive Index



TYPING SPEED		
Company	Total Calls	Average WPM
	#	#
AT&T	150	N/A
Sorenson	150	N/A
*Hamilton IP	148	72.1
*Sprint IP	150	76.4
*i711	150	48.4
IP Segment Average	149	65.6

**WPM results may be influenced by Internet performance.*

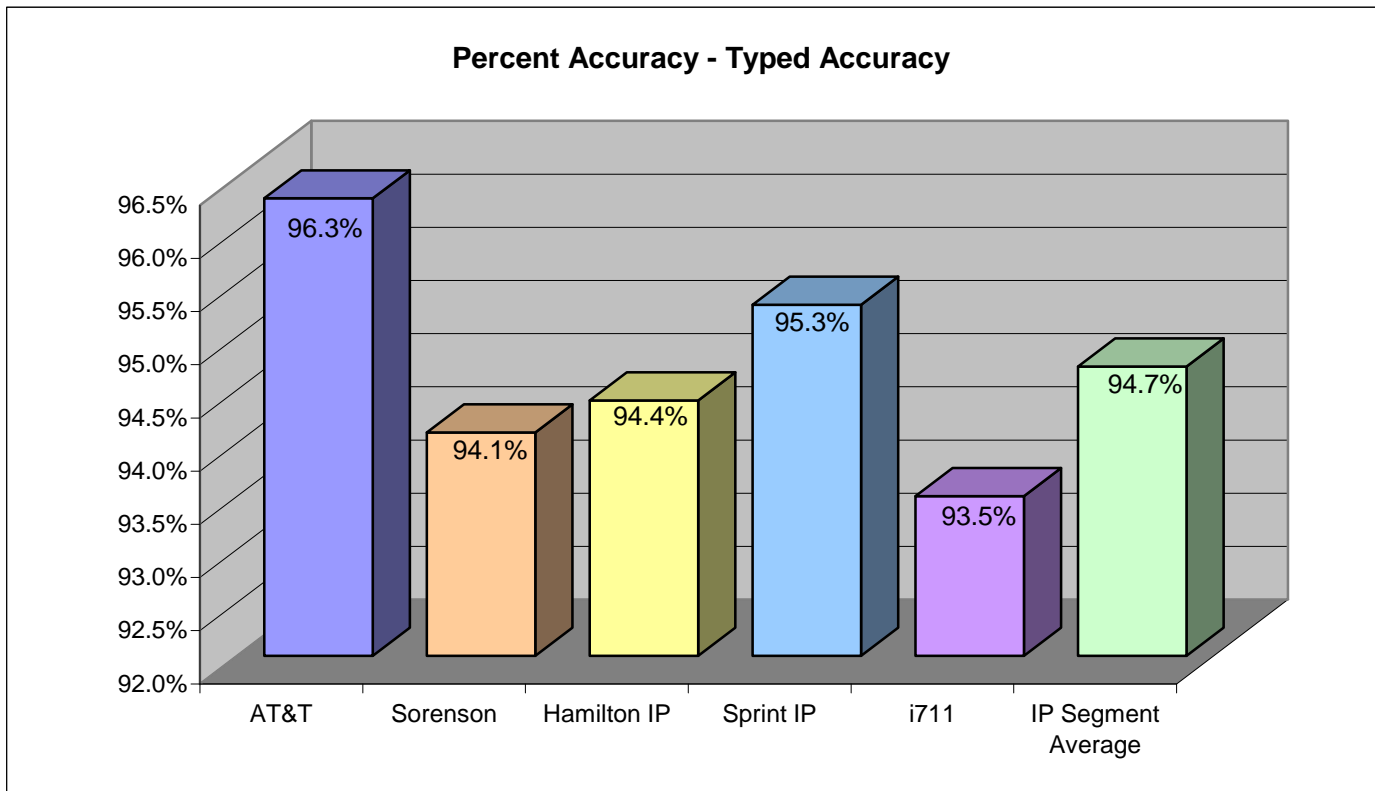
National Relay Competitive Index



TYPING SPEED						
Company	Total Calls	Less Than 60 WPM		60 Plus WPM		Error of Estimation
	#	#	%	#	%	%
AT&T	N/A	N/A	N/A	N/A	N/A	N/A
Sorenson	N/A	N/A	N/A	N/A	N/A	N/A
*Hamilton IP	148	34	23.0%	114	77.0%	6.8%
*Sprint IP	150	24	16.0%	126	84.0%	5.9%
*i711	150	127	84.7%	23	15.3%	5.8%
IP Segment Average	149	62	41.3%	88	58.7%	7.9%

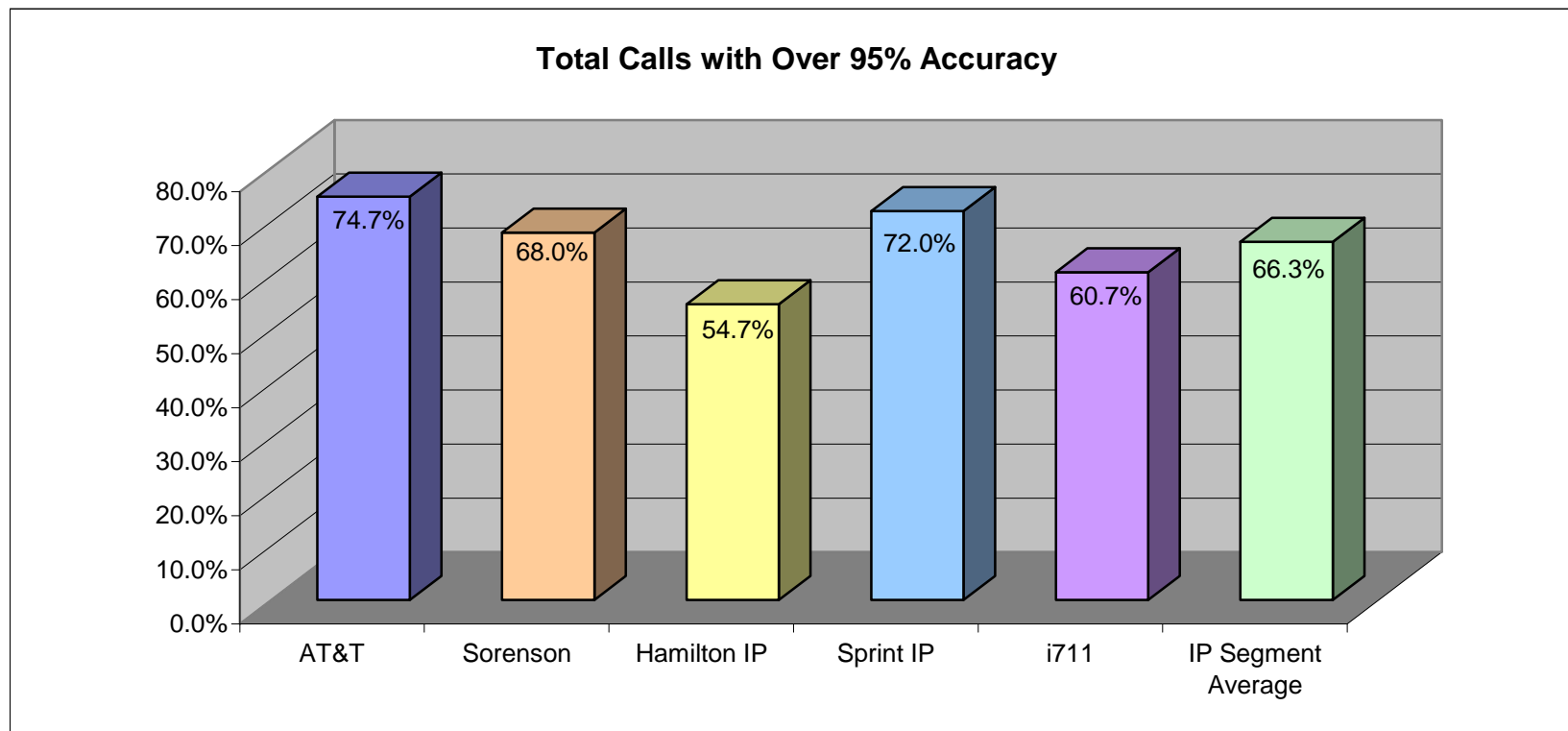
**WPM results may be influenced by Internet performance.*

National Relay Competitive Index



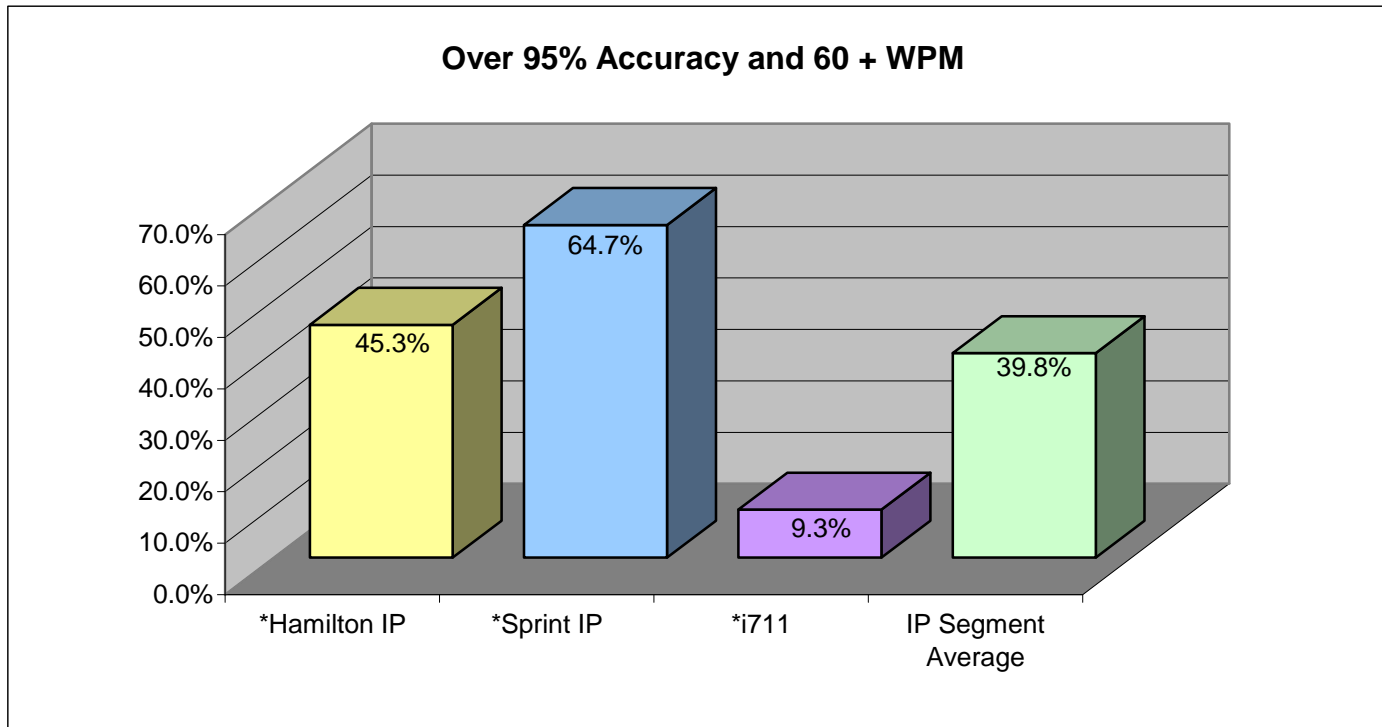
TYPED ACCURACY			
Company	Completed Calls	Percent Accuracy	Error of Estimation
	#	%	
AT&T	150	96.3%	3.0%
Sorenson	150	94.1%	3.8%
Hamilton IP	148	94.4%	3.7%
Sprint IP	150	95.3%	3.4%
i711	150	93.5%	3.9%
IP Segment Average	150	94.7%	3.6%

National Relay Competitive Index



TYPED ACCURACY							
Company	Completed Calls	Over 95% Accuracy		85% to 95% Accuracy		Under 85% Accuracy	
	#	#	%	#	%	#	%
AT&T	150	112	74.7%	34	22.7%	4	2.7%
Sorenson	150	102	68.0%	37	24.7%	11	7.3%
Hamilton IP	148	81	54.7%	63	42.6%	4	2.7%
Sprint IP	150	108	72.0%	33	22.0%	9	6.0%
i711	150	91	60.7%	45	30.0%	14	9.3%
IP Segment Average	149	99	66.3%	42	28.5%	8	5.6%

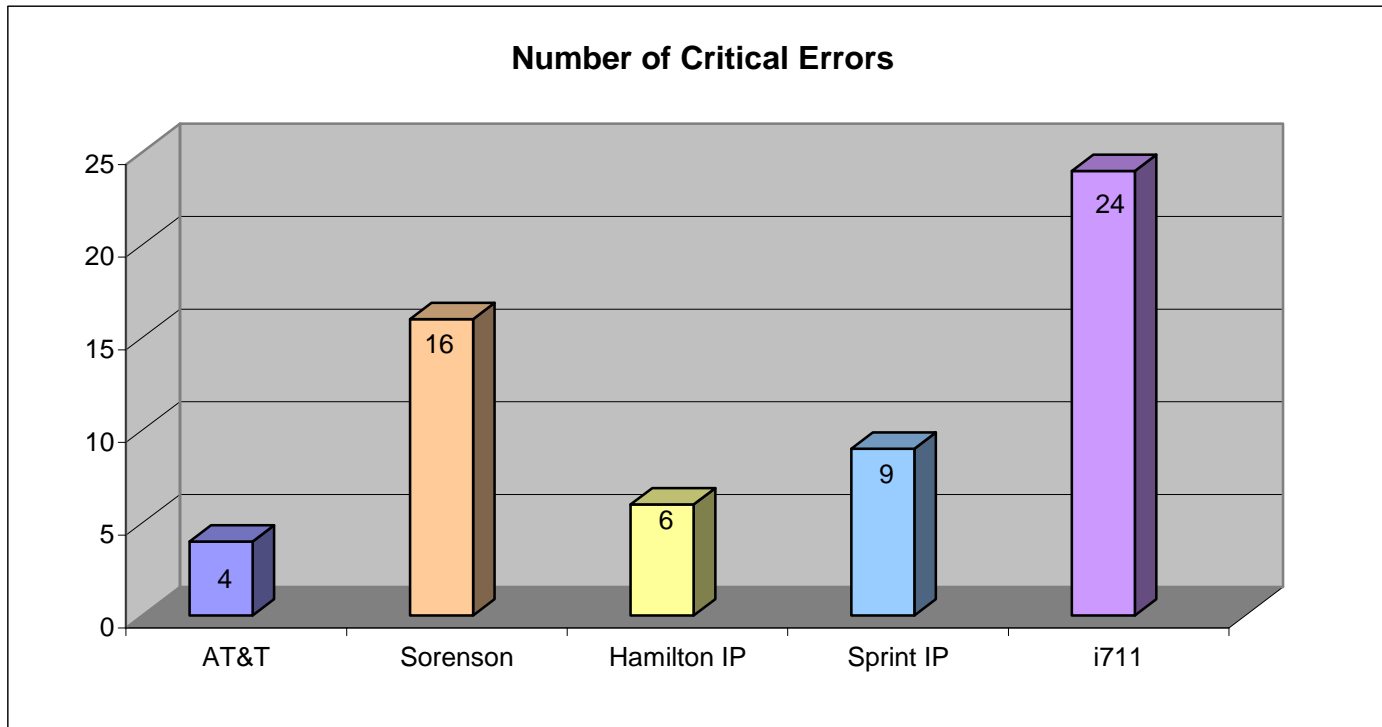
National Relay Competitive Index



TYPED ACCURACY AND SPEED		
Company	Total Calls Over 95% Accuracy & 60 + WPM	
	#	%
*AT&T	N/A	N/A
*Sorenson	N/A	N/A
*Hamilton IP	67	45.3%
*Sprint IP	97	64.7%
*i711	14	9.3%
IP Segment Average	59	39.8%

**WPM results may be influenced by Internet and/or Application*

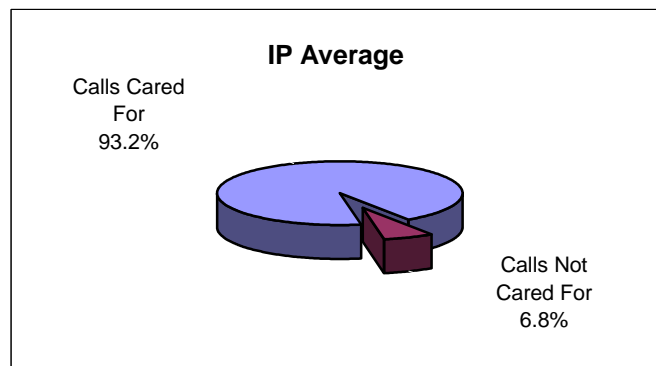
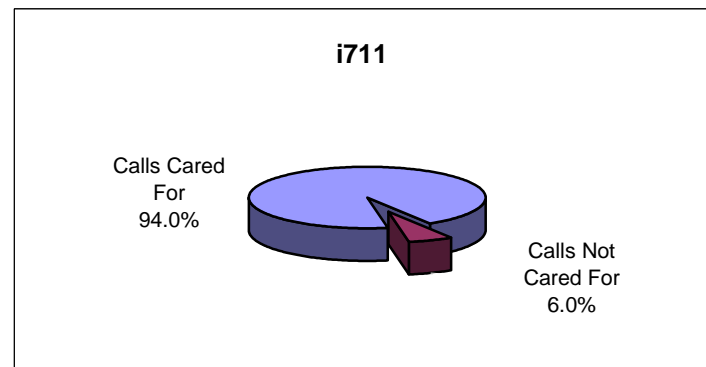
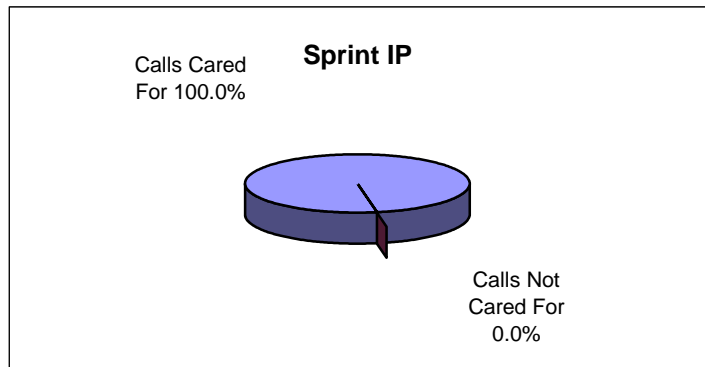
National Relay Competitive Index



Total Number of Critical Errors	
Company	Critical Errors
AT&T	4
Sorenson	16
Hamilton IP	6
Sprint IP	9
i711	24

National Relay Competitive Index

Overall Customer CareSM



	Sprint IP		i711		IP Segment	
	#	%	#	%	#	%
Total Calls Made	150	100%	150	100%	150	100%
Calls Cared For	150	100.0%	141	94.0%	139	93.2%
Calls Not Cared For	0	0.0%	9	6.0%	10	6.8%